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May 6, 2022

VIA ECF

Honorable Analisa Torres
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Timothy Shea, 20-CR-412 (AT)*

Dear Judge Torres:

On behalf of defendant Timothy Shea, whose trial is scheduled to begin before Your Honor on May 6, 2022, we respectfully submit this letter requesting the Court's permission for Mr. Shea and his attorneys, John Meringolo, Clara Kalhous, and Anjelica Cappellino, as well as his investigator, James Grant, to each bring a laptop computer into the courthouse located at 500 Pearl Street, New York, NY 10007 for use during the trial as well as for use during next week's May 10th AV training in the courtroom. Use of these devices during the pendency of the trial is vital to the efficient allocation of defense resources.

Therefore, in accordance with the rules of the Southern District of New York, we respectfully request that the Court issue an order granting permission for the computers' presence in the Courthouse from May 10th until the conclusion of the trial. For the Court's convenience and consideration, two completed copies of the Southern District's Electronic Devices General Purpose Order – one for counsel and one for Mr. Shea and the investigator – are attached hereto.

Thank you in advance for your consideration of this request.

Respectfully,

/s/
John Meringolo